

MONO COUNTY GENERAL PLAN DRAFT EIR



SECTION 6

ALTERNATIVES

6.0 INTRODUCTION**6.1 CEQA REQUIREMENTS**

CEQA requires that an EIR analyze a range of reasonable alternatives to a project, or to the location of a project, that would feasibly obtain most of the project objectives while avoiding or substantially lessening one or more significant environmental effects of the project. There are no ironclad directives governing the alternatives to be considered; instead, the selection of EIR alternatives is guided by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines §15126.6[f]). Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed.

A Notice of Preparation was circulated to the public and responsible and trustee agencies during June 2014 to solicit comments on the EIR scope and recommendations for a reasonable range of alternatives to the General Plan. No specific alternatives were recommended by commenting agencies or the general public during the NOP public review process; however, the NOP comment letter received from the Water Quality Control Board – Lahontan Region (LRWQCB) requested that the EIR identify current and future recycled water projects. Since there are currently no recycled water projects serving customers outside Mammoth Lakes, the LRWQCB request is analyzed in this section as an alternative that would potentially lessen the adverse effects on water availability identified in EIR §4.8, Hydrology. The NOP is provided in Appendix A. Copies of the NOP comment letters are provided in Appendix B, and EIR §1.7 provides a summary of key points raised in the NOP comment letters.

6.2 FACTORS GUIDING SELECTION OF ALTERNATIVES**6.2.1 Project Objectives**

The alternatives to the Draft Mono County *RTP/General Plan Update* were selected to minimize significant environmental impacts while fulfilling the basic objectives of the project. The basic objectives of the proposed project, as stated in EIR §3.2, Project Description, are to:

- *Update the General Plan and RTP and Provide Long-Term Planning Guidance:* Provide updates that are consistent with the Mono County vision and goals, and provide the County with long-term planning guidance in the form of specific objectives, policies, goals and programs that balance employment, housing, public services, economic growth and recreational opportunities with the need to protect and maintain the county’s environmental resources. Ensure that the updates address changes in circumstances, community priorities, and new requirements of law.
- *Respect Community Preferences and Private Property Rights:* Ensure that the RTP/General Plan and related planning efforts respect private property rights as well as the short- and long-term planning goals and objectives developed and recommended by the Mono County Planning Commission, Regional Planning Advisory Committees and communities. Within that framework, reflect the regional goals developed in collaboration with landowners, responsible and trustee agencies, regional planning partners, businesses, and other stakeholders. Adopt policies and undertake programs that combine innovative planning and sound science with the values of Mono County residents to achieve a sustainable future.

- Protect the Outstanding Scenic, Recreational and Environmental Resources of Mono County: Consistent with the Vision of the Mono County General Plan, protect the outstanding scenic, biological and recreational values and rural character of Mono County through environmentally responsible resource management, thorough analysis of potential impacts and alternatives and cumulative effects associated with the proposed RTP/General Plan Update and related planning initiatives, and cost-effective allocation of available funds.
- Facilitate Streamlining and Tiering of Future CEQA Documents and Provide Incentives for General Plan Compliance: Facilitate tiering of environmental documents to streamline CEQA compliance for future projects that conform to policies of the updated RTP and General Plan, consistent with the provisions of CEQA. Encourage and support tiering as a means to reduce the cost and redundancy of CEQA compliance in Mono County while safeguarding environmental resources and encouraging projects that conform to the General Plan.
- Strengthen County Infrastructure: Incorporate policies that provide for sound and forward-looking development, management, and maintenance of capital facilities, communications facilities, and community services.
- Promote Resource Efficiency: The objective to achieve and maintain resource efficiency is an integral part of the proposed project, as expressed in policies and actions proposed for numerous elements of the RTP/General Plan Update. Additional specific objectives are to reduce GHG emissions by (a) adopting a GHG-reduction goal consistent with AB 32, (b) developing estimates of feasible GHG reductions, (c) integrating feasible measures into the updated General Plan as a set of adopted policies and specific actions, and (d) complying with CEQA Guidelines §15183 to facilitate the assessment of future projects' compliance with adopted GHG policies and actions.
- Strengthen the Mono County Economy and Support Vibrant Rural Communities: As part of the current planning effort, the County has prepared an Economic Development Strategy that is intended to strengthen and enhance job opportunities and economic conditions throughout Mono County, and the initial principles and strategies are incorporated into the General Plan. As with many other project elements, the strategic plan includes strong provisions for multi-jurisdictional collaboration.

6.2.2 Potential Significant Adverse Environmental Effects

The significant environmental impacts associated with implementation of the Draft *RTP/General Plan Update*, as identified in this EIR, include:

- Impacts to Biological Resources: Potential impacts on candidate, sensitive and special-status species, potential impacts on riparian and other sensitive natural communities, potential impacts on wetland resources, and potential impacts on wildlife movement and nursery sites.
- Impacts related to Geologic Hazards: Potential exposure of residents and visitors to seismic effects, erosion impacts, potential exposure of residents and visitors to unstable geologic conditions, and loss of mineral resources.
- Public Safety Hazards: Human and environmental hazards including potential for release of hazardous materials, impacts related to inadequate emergency response, exposure to wildland fire risks, and potential exposure of residents and visitors to hazardous conditions including avalanche, landslides, dangerous storms, rockfall and volcanic activity.
- Impacts to Cultural Resources: Potential for impacts to prehistoric or historical resources, potential impacts to paleontological resources and potential impacts to sacred lands.
- Impacts to Water Quality, Hydrology and Water Supply: Potential for violation of water quality objectives, potential for violation of waste discharge requirements, potential for inadequate water supplies to meet community needs, and potential for impacts related to drainage and erosion.
- Recreation: Impacts on environmental resources associated with recreational facilities and activities.
- Impacts to Aesthetic and Visual Resources and Dark Night Skies: Impacts to scenic resources in a state scenic highway, degradation of visual character or quality, and reduced daytime and nighttime views due to added sources of light and glare.

- Delivery of Services: Potential inability of some special districts and service areas to reliably meet demands of growth and assure public safety.

6.3 Selection of Alternatives

CEQA Guidelines §15126.6(b) states that the range of alternatives should include those that could feasibly accomplish most of the basic project objectives and could avoid or substantially lessen one or more of the significant effects. The EIR should also briefly describe the rationale for selecting the alternatives, and identify any alternatives that were considered by the lead agency but rejected as infeasible; among the factors that may be used to eliminate alternatives from detailed consideration are a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant effects. CEQA Guidelines §15126.6(c) states that the EIR should provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project, and allows use of a matrix to display major characteristics and significant effects of each alternative.

6.3.1 Alternatives Considered in this EIR

Alternative 1: No Project Alternative: Under Alternative 1, the County would not adopt or implement the Draft *RTP/General Plan* Update or the related planning initiatives. The existing 2001 Mono County *General Plan* (all elements) and the 2008 RTP (with 2013 updates) would continue to be implemented as at present, and no changes or other planning initiatives would occur until subsequent proposals are formulated, evaluated under CEQA, and considered for approval by the Mono County Board of Supervisors and other responsible and trustee agencies.

Alternative 2: Compact Development Alternative: Both the existing and the proposed *RTP/General Plan Update* reflect a long-standing priority of Mono County to limit growth to existing communities. Opportunities remain that would enable this goal to be more fully realized. Alternative 2 considers a series of steps that would curtail development outside community areas through increased minimum acreage requirements for subdivisions, agricultural lands and other similar uses, and through higher development density allocations within defined community boundaries.

Alternative 3: Proactive Resource and Biological Policy Alternative: During the course of the *RTP/General Plan* update, the County considered a wide range of potential policies for each of the General Plan elements. The County ultimately recommended policies for each *General Plan Element* based on an assessment of their ability to feasibly achieve the stated project objectives. At the same time, it was recognized that some of the excluded policies had substantial merit, and warranted consideration. Alternative 3 presents and describes policies for resource efficiency and biological conservation that were considered and found meritorious but ultimately not recommended due to potential infeasibility.

6.3.2 Alternatives Rejected from Further Consideration in this EIR

CEQA Guidelines §15126.6 states that the discussion of alternatives should focus on alternatives that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree attainment of project objectives, or would be more costly.

Alternative 4: Water Reclamation Alternatives: Several areas of Mono County are currently water limited and other areas are likely to encounter water-supply limitations in future years. Quite a few Mono County community areas rely on groundwater supplies for which safe yield is unknown, and other communities rely on groundwater that does not meet drinking water standards and must be blended or treated, often at significant cost, to become potable. These constraints indicate that there may not be sufficient water supplies available from existing entitlements, facilities and resources to serve *RTP/General Plan* growth in some parts of the county.

The lack of a reliable water supply is identified in §6.2.2 as a significant and unavoidable adverse project impact, as is the potential for improper discharge of wastes and associated impairment of water quality. In its comments on the EIR Notice of Preparation, the LRWQCB urged Mono County to take a critical look at the cumulative effects on water quality that could result from project implementation, including point impacts and impacts to groundwater resulting from increased impervious surfaces, soil compaction, changes in water quality, impacts on beneficial uses and habitat

connectivity, potential flooding implications and landfill implications. In its comments on the NOP, LRWQCB encouraged Mono County to consider the use of recycled water as an implementation strategy in the *RTP/General Plan Update*.

As discussed in EIR §4.8 (Hydrology), Impact 4.8-3, despite the potential limitations on water supply, there are no water reclamation activities in any county locations outside the Town of Mammoth Lakes; only the Mammoth Community Water District currently engages in recycling. However, limited reclamation has been included as an element of at least one project. During 2008, the Board of Supervisors approved the Rock Creek Ranch project in Paradise, including a package wastewater treatment plant that would be equipped with a filtration and disinfectant system, with discharge of the treated effluent to unlined ponds on the site and subsequent use of the recycled/reclaimed water to spray irrigate the common and open-space areas. Although subsequent project amendments eliminated the package treatment plant, significant concerns were raised by LRWQCB (and others) concerning aspects of the proposed plan. In particular, LRWQCB emphasized the need for daily management of package treatment plants by a skilled and certified operator in order to avoid adverse outcomes including odors, nuisance conditions, and violation of water quality objectives; LRWQCB also noted that seasonal variations in temperature and precipitation rates could impact plant performance.

LRWQCB referred to *Basin Plan* statements indicating that “*package treatment plants should be owned or controlled by a public agency or a private entity with adequate financial and legal resources to assume full responsibility for the inspection, monitoring, maintenance, and eventual decommissioning/reclamation of the system.*” The Final EIR response stated that Mono County Public Works Department is reluctant to enter into such agreements due to other obligations. The County’s position has not changed, which is one of several considerations that lead to elimination of this alternative. Other considerations would further complicate the County’s ability to implement recycling in the foreseeable future, including the small resident populations in Mono County communities coupled with wide fluctuation in tourist populations, the extreme variability in seasonal weather conditions, and topographic constraints. Also important is the fact that LAFCO has identified deficiencies in many of the existing special districts and service areas, raising concerns that the substantial management requirements for recycling could not be reliably fulfilled. To address identified shortcomings, LAFCO has suggested a number of sphere changes and reorganizations that would have potential to enhance service delivery, reduce administrative costs, eliminate duplication of services and/or provide greater financial resources and economies of scale. However, LAFCO’s recommendations call for concurrence of the involved districts’ Boards of Directors.

For all of the reasons cited above, the alternative for Mono County to consider the use of recycled water as an implementation strategy in the *RTP/General Plan Update* has been eliminated from further consideration at this time. However, the Draft *RTP/General Plan Update* and related planning initiatives do incorporate a wide range of policies and actions designed to reduce potential direct and cumulative effects on water supply and water quality including, notably, numerous policies specifically designed to incorporate Integrated Regional Water Management Plan (IRWMP) Strategies into Mono County General Plan policies (including Water Resources and Water Quality Goal 1, Objective C, Policy 4: ‘*Encourage effective water conservation programs for communities outside Mono County that benefit from water resources originating in the county, including recycled water projects where feasible*’).

Alternative 5: Transportation Alternatives: The *Draft RTP* indicates that during document preparation, the potential need for and feasibility of alternative modes of transportation to better achieve a full range of multi-modal options for residents and visitors was conceptually considered. As discussed in EIR §4.2, the existing transportation system in Mono County includes the highway and roadway system, transit services, aviation facilities, and non-motorized facilities (generally recreational facilities for bicyclists and pedestrians). Alternatives considered during RTP preparation included new transportation modes and new routes for highways and roadways. It was concluded during this review that the options for alternative transportation modes and routes are limited by the county’s isolation, topography, extreme weather conditions, small population, large distances between communities, large amounts of publicly owned land, and environmental constraints. Due to these factors, it was concluded that the existing highway and roadway system will continue to be the major component of the transportation system in the county, and that alternatives will not be developed during the 20-year time frame of the *Draft RTP*.

6.4 ANALYSIS OF ALTERNATIVES

6.4.1 Alternative 1: No Project Alternative.

Under the No Project Alternative the County would not adopt or implement the Draft *RTP/General Plan Update* or the related planning initiatives. The existing 2001 Mono County *General Plan* (all elements) and the 2008 RTP (with 2013 updates) would continue to be implemented as at present, and no changes or other planning initiatives would occur until subsequent proposals are formulated, evaluated under CEQA, and considered for approval by the Mono County Board of Supervisors and other responsible and trustee agencies. New growth and development would be allowed as envisioned in the existing RTP and General Plan. Table 6-1 shows the acreages of each land use designation for the existing General Plan Land Use Element, compared to the proposed General Plan Land Use Element:

| LAND USE DESIGNATION | 2001 LUE | | PROPOSED 2015 LUE | | % Change in Acres, 2001-2015 | % Change in Units, 2001-2015 |
|----------------------------------|----------------|----------------|-------------------|-------------------|------------------------------|------------------------------|
| | TOTAL AC | MAX DU ALLOWED | TOTAL ACRES | MAX UNITS ALLOWED | | |
| AG - Agriculture | 79,156 | 7,124 | 77,177 | 9,275 | -2.5% | +30.2% |
| C - Commercial | 173 | 2,595 | 157 | 1,762 | -9.2% | -32.1% |
| CL - Commercial Lodging | 41 | 615 | 44 | 502 | +7.3% | -18.4% |
| ER - Estate Residential | 4,426 | 1,798 | 4,454 | 1,453 | +0.6% | -19.2% |
| I - Industrial | 94 | -- | 81 | 44 | -13.8% | NA |
| IP - Industrial Park | 41 | -- | 22 | 7 | -46.3% | NA |
| MFR - Multi-Family Residential | 58 | 760 | 50 | 547 | -13.7% | -28.0% |
| MU - Mixed Use | 380 | 5,700 | 302 | 3,403 | -20.5% | -40.3% |
| NHP - Natural Habitat Protection | 31 | 6 | 40 | 8 | +29.0% | +33.3% |
| PF - Public Facilities | 555 | -- | 6 | 7 | -98.9% | NA |
| RE - Resource Extraction | 556 | -- | 139 | 2 | -75.0% | NA |
| RM - Resource Management | 29,810 | 745 | 31,469 | 736 | +5.6% | -1.2% |
| RMH - Rural Mobile Home | 508 | 417 | 442 | 384 | -13.0% | -7.9% |
| RR - Rural Residential | 4,201 | 1,076 | 4,021 | 992 | -4.3% | |
| RU - Rural Resort | 573 | -- | 344 | 70 | -40.0% | NA |
| SAA - Scenic Ag | 4 | 4 | 3 | 10 | -25% | +150% |
| SC - Service Commercial | 12 | -- | 8 | 32 | -33.3% | NA |
| SFR - Single-Family Residential | 1,027 | 3,981 | 899 | 2,732 | -12.5% | -31.4% |
| SP - Specific Plan | 1,745 | 2,264 | 957 | 1,582 | -45.2% | -30.1% |
| OS - Open Space | 68,377 | 848 | 82,096 | 1,026 | | |
| TOTAL PRIVATE LANDS | 192,359 | 27,929 | 202,711 | 24,607 | +5.4% | -11.9% |

Although Table 6-1 points to substantial changes in acreage for a number of designations, these changes (as detailed in EIR §4.1, Impact 4.1(a)), are largely the result of the more-precise mapping utilized in this 2015 *General Plan Update*, as well as repeal of the Conway Ranch Specific Plan, General Plan Amendments approved since 2001, and refinements to planning area designations and boundaries.

Under this alternative, the existing RTP and General Plan policy framework and regulations would remain in effect for the foreseeable future, and the purpose and goals underlying proposed changes would not be realized. These underlying goals, which would not be realized with the No Project Alternative, include:

- Strengthened opportunities for multi-modal transportation;
- A conservation framework for protecting the Bi-State greater sage grouse population and other plant and wildlife species and habitats in Mono County;

¹ See the explanatory footnotes provided in source Table 4.1-6 (EIR §4.1, Land Use). the source table for

- Assertive steps to reduce greenhouse gas emissions and seek alternative energy sources;
- Incorporation of regional water management strategies into the County's basic General Plan policy structure;
- Integration and expansion of the County's waste management planning effort;
- Development of a more-extensive and interconnected trail system for recreational use;
- Upgrades to the design and layout of Main Street parking, traffic and commercial elements;
- New policies governing landownership adjustments to support riparian and natural resource conservation;
- Adoption of updated policies supporting improved stormwater management and implementation of Low Impact Development (LID) guidelines; and
- New land use designations for Conway Ranch.

Many of these plans and policies are only in the formative stages at this time, and cannot in any event be implemented without further CEQA analysis and discretionary review. Moreover, the No Project Alternative would not foreclose the option for future consideration of any of the proposed programs. However, because a number of the proposed programs are mandated by state legislation, the No Project Alternative would potentially foreclose some grant funding options that would otherwise be available to Mono County. Of particular concern in this regard would be the Regional Transportation Plan, the Integrated Regional Water Management Plan, the biological conservation policies, and the Resource Efficiency Plan and associated policies for reducing GHG emissions.

The No Project Alternative would not achieve basic project objectives to a) provide updated long-term planning guidance consistent with current state and federal policies, b) accurately reflect current RPAC preferences, c) provide additional means to protect environmental resources, d) facilitate tiering of later CEQA documents, e) support improvements to county infrastructure, f) reduce GHG emissions and encourage resource efficiency; or g) support vibrant rural economies. Nor would the No Project Alternative reduce one or more of the potentially significant adverse impacts associated with the project. In deferring adoption of conservation policies, the No Project Alternative would potentially undermine the recent USFWS decision not to list the Bi-State Greater Sage Grouse Population that considered the County's strong commitment to adopt protective local policies and regulations. Because it would allow for more homes and residents, the No Project Alternative would not reduce exposure to geologic and public safety hazards, or better protect mineral or cultural resources, or strengthen the ability of local utility and service districts to meet the demands of growth. Because the No Project Alternative does not allow for integration of IRWMP water management strategies or requirements of the proposed Grading Ordinance into the General Plan, it would fail to provide the County with effective tools for addressing water quality impairment, improved discharge of wastes, and reduced sedimentation. Moreover, the No Project Alternative would not comply with new General Plan requirements and planning laws, and would therefore compromise the legal adequacy of the county General Plan.

In summary, the No Project Alternative has no apparent advantages over the project as proposed, either in meeting basic project objectives or in reducing significant environmental effects, and is associated with several potentially significant drawbacks. Based on all of the considerations above, the No Project Alternative has been rejected as a CEQA alternative.

6.4.2 Alternative 2: Compact Development Alternative

6.4.2.1 Introduction. Both the existing *General Plan* and the proposed *General Plan Update* reflect a long-standing priority of Mono County to focus growth in and adjacent to existing communities. On the other hand, all of the General Plan land use designations (except Industrial Park) would allow for some level of residential development. Even the Open Space designation allows for limited residential development (up to one unit per 80 acres).

Under Alternative 2, the allowed residential density for the Agriculture use designation would be reduced from one unit per 2.5 acres to one unit per 40 acres, and the allowed density for Open Space would be reduced from one unit per 80 acres to one unit per 160 acres provided, however, that existing parcels (regardless of size) would be entitled to one unit. The lower density would reduce residential development potential on agricultural lands from 9,275 units (under the proposed *General Plan*) to 1,930 units; on open-space lands, the lower density would reduce development potential by half (518 units). In combination, these two revised density allowances would reduce overall build-out dwelling units and

population in Mono County by about one-third. In all other respects, Alternative 2 would be unchanged from the proposed *RTP/General Plan Update*.

6.4.2.2 Project Objectives. Alternative 2 would be substantially as effective as the proposed *RTP/General Plan Update* in meeting all of the basic project objectives. In some cases, Alternative 2 would be more effective, as discussed below:

- Update the General Plan and RTP and Provide Long-Term Planning Guidance: As envisioned herein, Alternative 2 would be identical to the current project proposal in all respects except that the allowed residential density for the Agriculture use designation would be reduced from one unit per 2.5 acres to one unit per 40 acres, and the allowed density for Open Space would be reduced from one unit per 80 acres to one unit per 160 acres. Alternative 2 would thus provide the same level of long-term planning guidance as the proposed project, and would place the same emphasis on providing specific objectives, policies, goals, actions and programs that balance employment, housing, public services, economic growth and recreational opportunities in Mono County with the need to protect and maintain the county's environmental resources.
- Respect Community Preferences and Private Property Rights: Alternative 2 is broadly consistent with countywide goal #11, that the overall attitude of RPACs and community planning groups is that growth should be contained in and adjacent to existing communities, that agricultural lands should be protected for their open space and economic value, that the protection of scenic resources is a critical concern, and that the use and development of resources should be regulated in a manner that allows for development but protects the resource. However, the density modifications contemplated in Alternative 2 were not presented to the community RPACs for discussion during development of the General Plan, and were not among the land use scenarios developed by the RPACs for consideration in the current update. Moreover, the reduced densities may be viewed as contrary to private property rights. By these key measures, Alternative 2 would be less representative of community goals and preferences, and less respectful of private property rights, than the current RTP/General Plan proposal.
- Protect the Outstanding Scenic, Recreational and Environmental Resources of Mono County: Countywide goal #11 states that the RPACs and community planning groups have generally expressed a desire to protect the county's natural resources, and that the overall attitude is that agricultural lands should be protected for their open space and economic value. By reducing the allowed density of residential uses in agricultural lands, Alternative 2 would more effectively adhere to this aspect of environmental protection than would the project as currently proposed.
- Facilitate Streamlining and Tiering of Future CEQA Documents and Provide Incentives for General Plan Compliance: The proposed project and Alternative 2 would both fulfill the objective to provide a basis for tiering when preparing future project level environmental documents that are consistent with the *RTP/General Plan Update* once adopted, and thereby reducing the cost and redundancy of CEQA compliance in Mono County while safeguarding environmental resources. There is no substantive difference between the project and Alternative 2 with respect to this objective.
- Strengthen County Infrastructure: The proposed project and Alternative 2 would both fulfill the objective to incorporate policies that strengthen County infrastructure. However, Alternative 2 would more closely adhere to Mono LAFCO policies that promote the expansion of existing communities instead of the development of new communities (Countywide Goal #5), and may also more closely support Countywide Goal #9, which notes that water quality regulations have sharply limited residential development in areas that are not supported by community water and sanitation systems and also references the lack of improved roads as an impediment to development; both limitations generally apply to open space and agricultural lands.
- Promote Resource Efficiency: Conservation agriculture can significantly reduce GHG emissions and aid in carbon sequestration. The Resource Efficiency Plan contains a goal (Goal CO-3) to preserve open space and agriculture as a means to sequester carbon, with incentives to support practices (minimizing soil disturbance, maximizing soil surface cover and stimulating biological activity) that can sequester carbon without disrupting normal agricultural activities. If coupled with the recommendations and incentives described in Goal CO-3, Alternative 2 would provide greater opportunities for reduced GHG emissions than would the project as proposed.

- *Strengthen the Mono County Economy and Support Vibrant Rural Communities:* The *Mono County Economic Development Strategy* identifies 10 strategy objectives, one of which is specifically rooted in the county's agricultural heritage: Objective 8 calls for development of regional food systems over the long term. The *Strategy* states that agriculture represents 3.9% of total county employment, and identifies agriculture as a viable industry segment opportunity through development of locally branded and sold agricultural products. The *Strategy* notes that a strong ranching and agricultural sector also helps to maintain the ambience and feel of Mono County, and contains a series of action steps to expand the ways in which agriculture contributes to the Mono County economy. The changed residential densities described under Alternative 2 would remove some of the growth pressures that could over time reduce the acreage of agricultural and open-space lands in Mono County. In light of the importance of agriculture to the economic development strategy, Alternative 2 would better support this objective than would the project as proposed.

6.4.2.3 *Avoidance of Significant Effects.* Alternative 2 would be more effective than the proposed project in terms of reducing or avoiding potentially most of the significant adverse project impacts identified in this EIR, as discussed below:

- *Biological Resources:* Biological surveys for the proposed *RTP/General Plan Update* were limited to community areas as depicted in the Biological Resources Report (see <http://monocounty.ca.gov/planning/page/mono-county-general-plan-update> for the full report; a summary is provided in EIR §4.4.) For lands outside the survey areas (including most agricultural and open space lands as well as all public lands), this EIR does not and cannot characterize the types of impacts that are likely to occur; these potential effects would be determined through individual surveys conducted at the time specific land use proposals are under review. Alternative 2 would direct future growth away from land areas that have not yet been surveyed for potentially sensitive or protected plant and wildlife species. In so doing, Alternative 2 would more effectively avoid (as opposed to mitigate) the potential environmental effects on biological resources associated with the proposed *RTP/General Plan Update*. By concentrating growth in existing community areas, Alternative 2 would better accommodate the conservation of wildlife populations, corridors and habitat.
- *Geologic Hazards:* The potential exposure of residents and visitors to seismic effects, erosion impacts, unstable geologic conditions, loss of mineral resources and improper waste discharges would be substantially the same for Alternative 2 as for the proposed *RTP/General Plan Update*.
- *Public Safety Hazards:* Human and environmental hazards include the potential for release of hazardous materials, impacts related to inadequate emergency response, wildland fire risks, and potential exposure of residents and visitors to hazardous conditions including avalanche, landslides, dangerous storms, rockfall and volcanic activity. The exposure of residents and visitors to these hazards would be substantially the same for Alternative 2 as for the proposed *RTP/General Plan Update*. However, by concentrating growth inside existing community boundaries, Alternative 2 would allow more-effective deployment of human and material resources to respond to emergency situations.
- *Cultural Resources:* Many of the potentially significant impacts to cultural resources can be avoided or mitigated through cultural resource surveys of properties that are proposed for development; this would be equally true for the project as proposed and for Alternative 2. Cultural resources are also jeopardized by public access, particularly where unlawful trails expose cultural resources in unsurveyed areas to vandalism. The potential impacts to cultural resources would be substantially the same for Alternative 2 as for the proposed *RTP/General Plan Update*.
- *Water Quality Impairment, Improper Waste Discharges, Water Supply Uncertainty and Erosion:* In comparison with the proposed project, Alternative 2 would be more amenable than the proposed project to programs designed to avoid or lessen water quality impairment, improper waste discharge, supply uncertainty, and erosion. By directing growth more effectively inside existing communities, Alternative 2 would better accommodate LID techniques that reduce watershed impacts by maintaining a landscape that is functionally equivalent to predevelopment hydrologic conditions. Alternative 2 would also be better suited to future wastewater treatment and reclamation activities than more-dispersed development patterns, and would more readily accommodate many of the proposed policies for incorporating IRWMP strategies into the Mono County General Plan. The main contributors to erosion and sedimentation in Mono County include grazing, mining, high-intensity recreational use, runoff from

developed areas, flooding, earthquakes and fire damage. Most of these factors would be substantially the same for Alternative 2 as for the proposed *RTP/General Plan Update*. However, the compact development patterns associated with Alternative 2 would allow for more-effective runoff collection than dispersed development, and would also reduce wildfire hazards by limiting the interface of wildlands and urban areas.

- *Aesthetic and Visual Resources:* Agricultural and open-space lands, both of which would be subject to the reduced development densities allowed under Alternative 2, are generally located on lands outside developed communities. The reduced development densities would allow for fewer sources of light and glare in these areas, and would also lessen the visual intrusion of structures and ancillary facilities that could diminish scenic values along designated scenic corridors and visual character overall. Alternative 2 would simultaneously preserve in agricultural or open-space uses the lands that would otherwise have been subject to development, thereby retaining a greater degree of visual integrity. Both factors would serve to minimize impacts to scenic and visual resources as well as dark night skies, relative to the *RTP/General Plan Update* as currently proposed.
- *Recreation:* Impacts associated with recreational activities generally increase with the intensity of the recreational use. Neither the proposed project nor Alternative 2 would entail changes in the availability of recreational areas or the intensity of use patterns or locations or in the recreational planning concepts under consideration. For these reasons, the environmental impacts of recreational activities would be substantially the same for Alternative 2 as for the proposed *RTP/General Plan Update*.
- *Delivery of Services:* As discussed in EIR §4.13, several of the special districts in Mono County are struggling to meet existing demands and may be unprepared to meet the additional demands associated with future growth. Low ISO ratings, inadequate numbers or availability of volunteers and uncertain water supplies jeopardize future growth in a number of Mono County communities. In response, LAFCO has recommended that some of the agencies consider reorganization to enhance service delivery, reduce administrative costs, eliminate duplication of services, and provide economies of scale. The more-compact development patterns associated with Alternative 2 would allow more-effective deployment of human and material resources and would also better facilitate the consolidations recommended by LAFCO than would the *RTP/General Plan Update* as proposed.

6.4.2.4 Summary. With the exception of the objective to respect community preferences and private property rights, Alternative 2 would be as effective as the proposed project in meeting basic project objectives, and more effective at avoiding or lessening some of the potentially significant adverse effects.

6.4.2 **Alternative 3: Proactive Resource and Biological Policy Alternative**

6.4.2.1 Introduction. Biological resource conservation and energy resource efficiency are central goals of the proposed *RTP/General Plan Update*, as is evident in the policies, objectives and actions proposed and discussed throughout this EIR. At the same time, the County has an obligation to ensure that the recommended policies and actions are feasible. CEQA Guidelines §15364 defines 'feasible' as '*capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.*' Many of the policies and actions that were considered but excluded during preparation of the *General Plan Updates* offered unmistakable benefits in terms of the countywide goals of the General Plan and the Mono County Vision; most often, these more-aggressive proactive policy options were excluded due to feasibility concerns related to cost and social factors.

Feasibility and priorities change over time, however; actions that are infeasible today may be far more achievable in coming years. For these reasons, the excluded policies are presented in Table 6-2 (at the end of this section) as alternatives that may be considered by the county Board of Supervisors with the current or future General Plan Updates. Apart from the policies presented in this section, Alternative 3 would in all other respects be unchanged from the proposed *RTP/General Plan Update*. Table 6.2 lists the proactive resource efficiency and biological policies that were excluded from the project as proposed, but could be included with Alternative 3.

6.4.2.2 Project Objectives. With the exception of the objective to respect community preferences and private property rights, Alternative 3 would be substantially as effective as the proposed *RTP/General Plan Update* in meeting all of the basic project objectives, as discussed below.

- Update the General Plan and RTP and Provide Long-Term Planning Guidance: As envisioned herein, Alternative 3 would be identical to the current project proposal in all respects except that it would include a more aggressively proactive set of policies for achieving maximum resource efficiency and conservation of biological resources. Alternative 3 would thus provide the same level of long-term planning guidance as the proposed project, and would place the same emphasis on providing specific objectives, policies, goals, actions and programs that balance employment, housing, public services, economic growth and recreational opportunities in Mono County with the need to protect and maintain the county's environmental resources. However, in comparison to the proposed project, the proactive policy alternative would be more costly to achieve, and thus less responsive to fiscal and budgetary limitations.
- Respect Community Preferences and Private Property Rights: The *General Plan Land Use Element* cites several countywide goals that provide a context for analyzing Alternative 3. Countywide Issue #12 identifies natural resource conservation as a critical variable determining future land uses in Mono County; Alternative 3 would provide a more robust set of resource conservation policies than the proposed project and would thus better support Countywide Issue #12. Countywide issue #13 cites economic challenges the county has faced in recent years and emphasizes the need to expand job opportunities and ensure that development projects do not adversely impact service agencies; the proactive policies contained in Alternative 3 would likely place added financial burdens on the County related to policy administration and enforcement, and may also hamper job creation due to the tighter regulation of land and resources; thus Alternative 3 would be less supportive of Countywide Issue #13 than the project as proposed. Countywide issue #14 highlights the difficulty faced by rural areas in meeting state and federal regulations governing GHG emissions, but also notes that grant opportunities are increasing. As with the proposed project, the proactive resource efficiency policies have been selected due to their relevance in the rural Mono County environment. However, it is likely that the proactive policies would better position the County for grant funding than the project as proposed; in this respect, Alternative 3 would be more supportive of Countywide Issue #14 than the project as proposed. Countywide Issue #15 cites the link between built environments and community health; because Alternative 3 would place greater controls on land use patterns, circulation and densities, it would also be expected to better support Countywide Issue #15 than the project as proposed.

Notwithstanding the benefits noted above, it is anticipated that Alternative 3 would impose additional controls on privately owned property and, as with Alternative 2, the more aggressive policies and actions contemplated in Alternative 3 were not presented to the community RPACs for discussion during development of the General Plan. Alternative 3 would be less representative of community goals and preferences and private property rights than the current *RTP/General Plan* proposal.

- Protect the Outstanding Scenic, Recreational and Environmental Resources of Mono County: Countywide goal #11 states that the RPACs and community planning groups have generally expressed a desire to protect the county's natural resources, and that the overall attitude is that agricultural lands should be protected for their open space and economic value. The relatively stronger emphasis of Alternative 3 on resource efficiency and natural resource conservation would better protect the outstanding scenic, recreational and environmental resources of Mono County than the project as proposed.
- Facilitate Streamlining and Tiering of Future CEQA Documents and Provide Incentives for General Plan Compliance: The proposed project and Alternative 3 would both fulfill the objective to provide a basis for tiering when preparing future project-level environmental documents that are consistent with the RTP and General Plan Update once adopted, and thereby reducing the cost and redundancy of CEQA compliance in Mono County while safeguarding environmental resources. There is no substantive difference between the project and Alternative 3 with respect to this objective.
- Strengthen County Infrastructure: The proposed project and Alternative 3 would both fulfill the objective to incorporate policies that strengthen County infrastructure. However, the added administrative and enforcement

costs imposed by Alternative 3 may undermine the County's ability to fund needed infrastructure. In this respect, Alternative 3 would be less supportive than the proposed project of the objective to strengthen County infrastructure.

- Promote Resource Efficiency: Alternative 3 would better promote resource efficiency than would the project as proposed. As noted in Table 6-2, the Proactive Policies for resource efficiency include actions that would conserve water resources, reduce the number of septic tanks, support conservation agriculture, accelerate renewable energy investments, encourage the use of alternative fuel vehicles and shuttle systems, and many other activities that would better promote resource efficiency than the project as now proposed. Although some of the proactive policies may be costly to implement and enforce, it is anticipated that some of the costs would be offset by savings (for example, energy savings) and grant funding assistance.
- Strengthen the Mono County Economy and Support Vibrant Rural Communities: The *Mono County Economic Development Strategy* does not make specific reference to resource efficiency as an element of the economic plan, but does emphasize tourism as the dominant sector of the economy. The *Economic Development Strategy* notes that the price of fuel has been an ongoing concern that can impact the travel decisions of price-sensitive consumers. The US Department of Energy notes that despite a decline in sales between 2008 and 2011, hybrid electric vehicle (HEV) sales again increased in 2012 in response to economic recovery, increased gasoline prices and new CAFÉ standards. Overall, there has been a steady increase in alternative-fuel vehicles over the past 15 years, with widest use of vehicles that run on E85, propane, compressed natural gas and electricity.² In providing for a direct current (DC) fast-infrastructure plan (that would allow EV recharge in 15-30 minutes), the proactive policy alternative may contribute to tourism development and marketing by supporting visitors who drive alternative-fuel vehicles.

6.4.2.3 Avoidance of Significant Effects. Alternative 3 would be more effective than the proposed project in terms of reducing or avoiding potentially most of the significant adverse project impacts identified in this EIR, as discussed below.

- Biological Resources: Alternative 3 contains a wide range of provisions designed to effectively conserve and support the sensitive species and habitat and hydrologic resources of Mono County. Included among the recommendations are provisions that would slow the spread of invasive species, reduce predation of sage grouse populations and vehicle collisions with migrating deer populations, mandate use of native plants and seed stock in revegetation plans, minimize the pollution of riparian and wetland area and reestablish food sources for deer and nesting areas for overwintering bird populations. In whole, Alternative 3 would be far superior to the project as proposed in reducing or avoiding the adverse impacts on biological resources associated with long-term implementation of the *RTP/General Plan Update*. In combination, the recommended policies would substantially lessen the significant adverse impacts of the proposed 2015 *RTP/General Plan Update* on candidate and special status species, riparian habitat, wetlands, wildlife movement and migration, and protection of large native trees.
- Geologic Hazards: The potentially significant and adverse exposure of residents and visitors to seismic effects, erosion impacts, unstable geologic conditions and loss of mineral resources would be substantially the same for Alternative 3 as for the proposed *RTP/General Plan Update*.
- Public Safety Hazards: The potentially significant and adverse exposure of residents and visitors to public safety hazards (including potential releases of hazardous materials, impacts related to inadequate emergency response, wildland fire risks, and hazardous conditions such as avalanche, landslides, dangerous storms, rockfall and volcanic activity) would be substantially the same for Alternative 3 as for the *RTP/General Plan Update* as now proposed.
- Cultural Resources: The potentially significant adverse impacts to cultural resources would be substantially the same for Alternative 3 as for the proposed *RTP/General Plan Update*.
- Water Quality Impairment, Improper Waste Discharges, Water Supply Uncertainty and Erosion: Alternative 3 contains a number of policies and actions that are specifically intended to reduce potential impacts of growth and development on groundwater, stream-flow dynamics, aesthetics, and recreational functions and values. Included are

² US Department of Energy, Alternative Fuels Data Center: <http://www.afdc.energy.gov/data/>.

measures that would require the County to establish a baseline water-quality database and thereafter verify the source of deviations from the baseline, impose advanced BMP requirements and water quality monitoring, and prohibit septic leach fields for projects adjacent to wetland and riparian areas. In combination, these added measures would have the potential to reduce to less than significant levels the impacts associated with violations of water quality objectives and waste discharge requirements. The potentially significant impacts associated with water supply uncertainty and erosion would be similar for both Alternative 3 and the project as proposed.

- *Aesthetic and Visual Resources*: Alternative 3, as envisioned, would be limited to policy changes designed to more effectively and proactively achieve goals for habitat and ecological protection, resource efficiency, and transportation. Although no specific modifications to land use designations or acreages would occur under this alternative, Alternative 3 may nonetheless reduce overall development densities within Mono County by creating standards and regulations that render some properties too difficult or too costly to develop. The impact on visual and aesthetic resources associated with this scenario would likely be negligible. However, more significant benefits may result from the increased integrity of ecological habitats and their dependent plant and wildlife species. Overall, Alternative 3 would have the same or fewer impacts on aesthetic and visual resources than the project as proposed.
- *Recreation*: Alternative 3 proposes two policies that would reduce impacts on recreation relative to the project as proposed: Policy 1.3 would require projects to demonstrate that impacts on the recreational functions of water bodies would be less than significant, and Policy 2.2 would require that new culverts and drainage structures not significantly impact recreational values. These policies would reduce the impacts discussed in EIR §4.9 (Recreation), but not to a level that is less than significant.
- *Delivery of Services*: None of the policy recommendations contained in Alternative 3 would substantially alleviate the challenges faced by several of the special districts in Mono County or facilitate implementation of the recommendations set forth by LAFCO in the Municipal Service Reviews. Moreover, the County and local service agencies may face added cost burdens (to administer and monitor the new regulations) that could impact availability of funding for other uses, potentially causing further declines in service delivery. Although Alternative 3 may reduce the waste load delivered to local landfills, it would not eliminate or lessen the need to identify a landfill to replace Benton Crossing (scheduled for closure in 2023) or reduce the potentially significant adverse impacts associated with siting, operation and maintenance of a replacement landfill thereafter.

6.4.2.4 *Summary*. Alternative 3 would be superior to the project in terms of reducing potential impacts to biological resources and water quality impairment; for all other potentially significant adverse effects, Alternative 3 would be no more effective than the project as currently proposed.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA §15126.6 requires, if the environmentally superior alternative is the 'no project' alternative, that the EIR shall also identify an environmentally superior alternative among the other alternatives. In practice, this requirement is understood as a requirement to identify the environmentally superior alternative. The environmentally superior alternative is the alternative that accomplishes the largest number of objectives, and most effectively avoids or eliminates potentially significant adverse impacts, and is associated with the fewest adverse environmental impacts when compared to the proposed project.

A comparative analysis of the proposed project and each of the project alternatives is provided in Table 6-3 below. The table assigns a score of "0" to the proposed project and "-1," "0," or "+1" to each of the two alternatives to denote how each alternative compares to the proposed project in terms of meeting objectives and lessening the severity of potential environmental effects. A score of "0" indicates that the alternative would have the same level of impact as the proposed project. A score of "+1" indicates that the alternative would have a better (or reduced) impact when compared to the proposed project. A score of "-1" indicates that the alternative would have a worse (or increased) impact when compared to the proposed project. The project alternative with the highest total score is considered the environmentally superior alternative.

| TABLE 6-3: Comparison of Project Alternatives with Proposed <i>RTP/General Plan Update</i> | | | | |
|---|-------------------------|-------------------------------|----------------------------|---------------------------|
| | Proposed Project | No Project Alternative | Compact Development | Proactive Policies |
| Environmental Effects | | | | |
| Land Use | 0 | -1 | +1 | 0 |
| Circulation | 0 | -1 | +1 | +1 |
| Air Quality/GHG | 0 | -1 | +1 | +1 |
| Biology | 0 | -1 | +1 | +1 |
| Geology | 0 | -1 | +1 | 0 |
| Hazards | 0 | -1 | +1 | 0 |
| Cultural | 0 | 0 | +1 | 0 |
| Hydrology | 0 | -1 | +1 | +1 |
| Aesthetics | 0 | -1 | +1 | 0 |
| Recreation | 0 | -1 | +1 | 0 |
| Agriculture | 0 | -1 | 0 | 0 |
| Population & Housing | 0 | -1 | 0 | 0 |
| Public Services | 0 | -1 | +1 | 0 |
| Noise | 0 | -1 | +1 | 0 |
| SUBTOTAL | 0 | -13 | +12 | +4 |
| Project Objectives | | | | |
| Update General Plan & Provide Planning Guidance | 0 | -1 | 0 | 0 |
| Respect Community Preferences & Private Property Rights | 0 | -1 | -1 | -1 |
| Environmental Protection | 0 | -1 | +1 | +1 |
| Streamlining and Tiering of CEQA Documents | 0 | -1 | 0 | 0 |
| Strengthen County Infrastructure | 0 | -1 | +1 | -1 |
| Promote Resource Efficiency | 0 | -1 | +1 | +1 |
| Strengthen the Mono County Economy | 0 | -1 | +1 | +1 |
| SUBTOTAL | 0 | -7 | +3 | +1 |
| SUMMARY TOTAL | 0 | -20 | +15 | +5 |

Scoring provided in Table 6-3 indicates that No Project Alternative is least effective at meeting project objectives and least effective at avoiding or reducing significant effects. Alternative 2, the 'compact development alternative,' would be environmentally superior to the proposed project. Alternative 3 would also be environmentally superior to the proposed project, though to a lesser degree than Alternative 2. Alternative 2 is therefore the environmentally superior project. However, Alternatives 2 and 3 are not mutually exclusive. If combined, the two alternatives would provide the benefits outlined above, and would further strengthen the benefits pertaining to environmental protection, resource efficiency and economic development.

Although environmentally superior to the proposed project, Alternative 2 is not recommended at the present time. Throughout the *RTP/General Plan Update* process, the Mono County RPACs and community planning groups have played a central role in identifying local goals and issues and developing appropriate land use recommendations. The density modifications contemplated in Alternative 2 were not presented to the community RPACs for discussion during development of the draft General Plan, were not among the land use scenarios developed by the RPACs for consideration in the current update, and would not - in the absence of RPAC support - respect private property rights.

With respect to Alternative 3, there has been no diminution of the feasibility concerns that lead to exclusion of the proactive biological resource and resource efficiency policies. However, Alternative 3 (like Alternative 2) has the potential to reduce several of the potentially significant adverse effects identified in this EIR, although not to a less than significant level.

In lieu of adopting Alternative 2 as the recommended project, this EIR instead recommends that a policy be added to the proposed project indicating that the County will present the density reductions described in Alternative 2 for future discussion among RPAC and community planning groups. If the discussions indicate that these changes are broadly supported, it is recommended that the County incorporate the revisions in a future General Plan Amendment.

With respect to Alternative 3, it is recommended that the County present each of the proactive policies for consideration by the Planning Commission and Board of Supervisors, with the goal of identifying and incorporating into the current project any and all proactive policies that are found (as is or with modifications) to be feasible at this time. It is recommended that the remaining proactive policies be reconsidered for adoption with the next General Plan Update.

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|--|--|---|--|
| BIOLOGICAL RESOURCE PROTECTION POLICIES | | | |
| <i>Conservation / Open Space (C/OS) Element</i> | | | |
| 1. Protect wetland communities and related riparian areas. | 1.1. Support a "No Net Loss" policy for projects that impact wetland and riparian areas. | 1.1.A. Projects shall be required to achieve "No Net Loss" through avoidance or minimization of impacts & compensation for unavoidable impacts in partnership with an established mitigation bank. | Proposed Conservation/Open Space (C/OS) Element policy defers to the agencies with regulatory authority over wetlands, as Mono County doesn't have that authority. |
| | 1.2. All compensatory agreements established as mitigation for unavoidable impacts shall include a Mitigation Monitoring and Reporting Plan describing the acreage, plant coverage and species composition goals by community type, and providing a scheduled monitoring program for at least three years with annual reporting to a responsible agency. | 1.2.A. The MMRP shall in all cases specify at least a 1:1 ratio of restoration extent if on site, and at least a 3:1 ratio of restoration extent if off site. 1.2.B. The goal of mitigation shall be to prevent net loss of acreage & function. Functions are defined as the specific physical, chemical & biological process and attributes of each affected wetland and riparian community. When setting replacement ratios for affected functions, the County shall include an appropriate margin of safety reflecting the expected degree of success beyond the minimum ratios shown in 1.3. | This concept (not including the details) was added to the proposed project to provide an example of a compensatory mitigation measure, with the standard of meeting requirements of CEQA and/or the Clean Water Act. |
| | 1.3. Environmental analyses will demonstrate that the potential impacts upon groundwater, stream-flow dynamics, aesthetics, and recreational functions and values will be less than significant for the life of the project. | | This change would not allow for a Statement of Overriding Considerations; any project having impacts would have to be denied regardless of benefits. Regulations exist in the proposed project to require "will serve" letters and impact assessments, and to deny projects not demonstrating availability or entitlement to a sufficient water supply. |
| 2. Degraded wetland & riparian plant communities within | 2.1. Prior to replacement, culverts & drainage structures associated with County facilities & roads shall be assessed for their potential to | | Policy was written as a "should." |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|---|---|--------|---|
| the unincorporated community areas of Mono County shall be restored. | redirect or convey flows that degrade water quality, and their potential to adversely impact flood-stage hydrology and thus cause erosion or siltation within wetlands and riparian areas. | | |
| | 2.2. New culverts & drainage structures shall not cause significant adverse impacts to wetland and riparian function, aesthetics and recreational values. | | Policy was written as a "should." |
| | 2.3. Projects within 300' of any wetland or riparian habitat shall include an analysis of the project's impact to shallow-water table dynamics and groundwater-dependent vegetation. | | Policy was written as a "should" and a specific distance was removed. "Close proximity" is used instead with a policy to consider establishing a buffer zone. |
| | 2.4. Projects that utilize new wells or increased well production, shall require a monitoring program (minimum three years), including aquifer stress tests to demonstrate the absence of a significant impact. | | Combined with 2.3: the proposed policy covers shallow water table dynamics and groundwater-dependent vegetation. |
| | 2.5. Wetland and riparian buffer areas shall be established. Buffer areas are to be protected from development. The standard buffer width shall be 50' beyond the outer edge of the wetland-dependent vegetation. The limits of wetland and riparian extents will be identified by a qualified professional when they cannot be easily determined by site inspection. | | Policy "discourages" development within a 30' buffer and considers establishing buffer regulations. |
| | 2.6. Wetland or riparian habitat restoration undertaken as mitigation for identified unavoidable adverse impacts from projects shall include removal of non-native vegetation. | | Added as an example of a mitigation measure, but not required. |
| | 2.7. Wildfire fuel reduction projects that encroach upon wetland or riparian habitat shall include removal of all non-native trees. | | Policy was written as a "should." |
| 3. Large roadside poplars shall be maintained for safety but not otherwise routinely | 3.1. Roadside and fencerow poplars having a girth exceeding 24" diameter at breast height in Benton Hot Springs, McGee Creek, Long Valley, Lee Vining, | | Policy language for 3.1 and 3.2 was made more general to reference large roadside and fencerow trees. Large is |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|--|--|--------|---|
| trimmed or removed, as these iconic trees are a significant aesthetic resource. | Bridgeport, Walker, Topaz and Coleville shall be exempted from policies directing removal of non-native plants. 3.2. Significant pruning that could affect the health or visual appeal or removal of these trees (3.1), will be permitted only upon approval of the Community Development Dept. | | generally defined as exceeding 24" in diameter. |
| 4. Impacts to wetlands, riparian habitat & special-status plant and animal species shall be minimized during routine maintenance of County roads & other facilities. | 4.1. Maintenance agreements shall incorporate to the maximum extent feasible based on field surveys, specific measures for avoidance of wetlands, riparian habitat and sensitive species during maintenance procedures. | | Policy requires consideration of impacts and defers to consultation and collaboration with appropriate state and federal agencies to determine a course of action. |
| | 4.2. Consider developing a long-term Habitat Conservation Plan (HCP) with the CA Department of Fish and Wildlife and US Fish and Wildlife Service in order to minimize impacts to special-status species habitats during routine maintenance. | | Numerous policies related to wildlife/habitat conservation, & policies specific to endangered/ threatened species, sensitive species/species of concern, sage grouse, and mule deer are in the proposed project. Maintenance issue is covered by 4.1. |
| 5. Protect and improve riparian system water quality. | 5.1. Establish a baseline water-quality database for concentrations of naturally occurring constituents (phosphorus, arsenic, mercury), suspended sediment loading, and water temperature at each unincorporated town area. | | Policy was not added as Mono County is not the jurisdiction with authority. Water quality is regulated by the state/feds. |
| | 5.2. Projects within 50' of identified riparian vegetation shall include provisions for the requirement of baseline water quality monitoring (5.1), for a period of at least one year following project implementation. | | Policy was not added as Mono County is not the jurisdiction with authority. Water quality is regulated by the state/feds. The state/fed agencies would regulate through CEQA. |
| | 5.3. Projects within 50 feet of identified wetland or riparian vegetation, or within 50' of a tributary to these systems, shall include the requirement for | | Proposed policy reduces setback to 30 feet. |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|--|---|--------|---|
| | implementation of BMPs as recommended by LRWQCB. | | |
| | 5.4. New and replacement septic leach fields shall not be permitted within 30 feet of identified wetland or riparian vegetation. | | Policy not added – regulated by the Environmental Health Department and not needed in the General Plan. |
| | 5.5. Investigate any significant deviations from the range of baseline water quality values (5.1) as they are detected, in order to identify and seek elimination of the pollution source. | | Policy not added since Mono County is not the jurisdiction with authority. State/feds would investigate. |
| 6. Contain and eradicate existing populations of non-native plants. | 6.1. Projects shall include a Revegetation Plan that specifies post-project implementation of weed control. Criteria for revegetation success will include the demonstration that new non-native plant populations have not been introduced to the developed property within the first three years of project implementation. | | Proposed policies require measures to ensure control of invasive, non-native plants. Requiring the “success” of mitigation as a condition of project approval is infeasible, but the best practices/mitigation available at the time can be required. |
| 7. The genetic integrity of native species that make up the characteristic plant communities of Mono County shall be maintained in order to preserve the inherent resiliency of the species. | 7.1. Revegetation plans shall include the requirement that all native plantings be derived from local stock. | | Policy was written as a “should.” |
| | 7.2. Purchased seed for revegetation shall be from sources collected within Mono County or Ecoregion 2 as defined by the California Dept. of Fish and Wildlife. | | Policy was written as a “should,” Ecoregion 2 not specified in policy. “Local native” vegetation is specified instead. |
| | 7.3. Revegetation plans in riparian or wetland settings shall include the requirement that willow cuttings and sedge or grass plugs be collected from adjacent on-site habitat, whenever feasible. | | Policy was rewritten as a “should” to avoid encouraging proponents to trespass onto adjacent private lands to get cuttings/plants, or enable adjacent landowners to stop a project by not allowing the collection of plants. |
| 8. Mule deer and important mule deer habitat shall be protected and enhanced to the | 8.1. Revegetation plan requirements shall include the provision that, when present, upland vegetation dominated by bitterbrush be returned to or maintained as native vegetation. | | Policy was written as a “should.” |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|---|---|---------------|--|
| greatest feasible extent. | 8.2. Projects shall include an analysis of temporary, construction-related impacts that could affect migrating mule deer. Mitigations may include restrictions on construction timing. | | This is addressed by CEQA and by County policies pertaining to deer impacts. |
| | 8.3. Unavoidable disturbance, degradation, or loss of overwintering or migratory corridor habitat for mule deer shall be offset by requiring compensatory mitigation. Impacts shall be compensated by acquisition of suitable remaining habitat for the purpose of preservation under a conservation easement, at a ratio of at least 2:1 | | In Hot Creek Zone, impacts to deer are not allowed for geothermal projects (e.g., no statement of overriding considerations). For other projects, policy language is more general – “impacts “should” be mitigated, no ratio identified. |
| 9. Projects shall result in an increase of the local carrying capacity for mule deer. | 9.1. Subdivision Maps shall include documentation of all known deer trails based upon a recent field survey. To the maximum extent feasible, lot lines and roadways shall be aligned to minimize trail loss and to minimize the number of road crossings. | | The environmental analysis for the subdivision would include deer trails in important deer habitat. |
| | 9.2. Disturbance of greater than 50% of any property shall include mapping of all known deer trails based upon a recent field survey. Projects must demonstrate preservation of an intact migration corridor of un-fragmented, primarily native habitats will remain on site during the life of the project. | | The environmental analysis for the subdivision would include deer trails in important deer habitat. |
| 10. A trail system for non-motorized travel shall be constructed near community areas. | 10.1. Trail crossings at riparian corridors shall be perpendicular to the trending direction of the corridor, and will occur at the narrowest available corridor segment. | | Policy is general to minimize intersections with identified sensitive plant communities, although the June Lake Area Plan does contain this specific policy. |
| | 10.2. Trail operations shall include the maintenance of wildlife-proof trash receptacles and other measures to avoid enhancing the environment for predators of special-status wildlife. | | This would not normally be under the County’s jurisdiction; it is more applicable to the USFS or BLM, for example. |
| 11. Enhancement of Bi-State greater sage grouse habitat shall be integrated into all | 11.1. The density of barbed-wire fencing near sage grouse leks and within occupied habitat shall be reduced. | | Policies defer to the Bi-State Action Plan and partnerships with other agencies. Policies are incorporated throughout |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|---|--|--------|--|
| relevant environmental stewardship actions. | 11.2. New fencing projects within the County's right of way shall be fitted with markers to increase visibility and constructed with t-posts or cone-tops that effectively deter perching by grouse predators | | C/OS suggesting project design features (including fences), requiring studies, requiring impacts be mitigated unless a Statement of Overriding Considerations is adopted, providing a listing of potential mitigation measures, committing to review of ministerial permits and continued work with the Bi-State group, prioritizing sage grouse habitat improvement projects, and minimizing impacts from linear infrastructure & grazing (see C/OS Action 2.A.3.e.). |
| | 11.3. Obtain a California Department of Fish and Wildlife Depredation Permit, and institute a raven population control program at the South County landfill site. | | The County is discussing landfill issues with applicable Bi-State partners to determine best conservation methods. |
| | 11.4. Prioritize and facilitate the incorporation of new conservation easements for projects in habitat that is suitable for use by grouse. | | The General Plan contains policies promoting conservation easements for valuable wildlife habitat, including sage grouse habitat. |
| | 11.5. Adverse impacts to sagebrush habitat, that is suitable for grouse use, shall be mitigated to a less than significant level. Mitigations may include restoration planting, invasive tree removal, and removal of other non-natives species. | | As noted for 11 above, policies are incorporated throughout C/OS suggesting design features, requiring studies, requiring impacts be mitigated unless Overriding Considerations are adopted, listing potential mitigations, committing to review of ministerial permits and continued work with the Bi-State group, prioritizing sage grouse habitat improvement projects, and minimizing impacts from infrastructure & grazing. |
| | 11.6. An analysis of potential impacts upon grouse habitat fragmentation and habitat connectivity within and between | | See above. |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|---|---|---|---|
| | Population Management Units shall be required for all projects. | | |
| | 11.7. County roads within two miles of known grouse leks shall be closed during the breeding season (typically March – May). | | See above. |
| 12. The nesting success of birds, including birds protected by the Migratory Bird Treaty Act, shall be protected & enhanced. | 12.1 Prior to construction, all projects shall be required prepare a Nesting Bird Plan approved by the California Department of Fish and Wildlife, unless construction impacts will occur entirely within a non-nesting time frame, typically September 15 through February 15. | | Listed as a possible project design feature that could mitigate impacts. Not required. |
| RESOURCE EFFICIENCY POLICIES | | | |
| Conservation / Open Space Element | | | |
| | | Action 1.B.2.a. Promote biomass heat/energy utilization projects meeting environmental standards as a means to incentivize fuel-reduction projects for healthy forests by creating an economic market for waste woody biomass. | This change emphasizes that the County will promote use of waste woody biomass (rather than all woody biomass) for energy generation. It should help protect forest resources in Mono County, as well as create additional opportunities to keep waste materials out of landfills. |
| | | Action 3.C.3.b. Require nonagricultural water-intensive development proposals to use graywater or recycled water whenever feasible. | This action would further reduce water use by new large-scale nonagricultural development. It does not require the use of graywater or recycled water for development, but ensures that these water conservation practices are fully evaluated & implemented unless there is a compelling reason not to. Proposed policy requires these projects use water conservation measures. |
| | | Action 4.B.2.c. Require new developments to use community package treatment systems whenever feasible. | This new action would reduce the number of new septic tanks in the county by requiring small-scale sewage treatment systems for new development, unless demonstrated to be infeasible. |

TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3

| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
|---|--------|--|---|
| | | Action 5.C.2.i. Encourage the use of agricultural wastes for energy production. | This new action supports the existing goal to improve agricultural practices by creating an additional program to convert agricultural wastes to energy. This practice would reduce waste production and increase the supply of renewable energy generated in the community. |
| GOAL 11. Encourage appropriately scaled renewable energy generation and storage for use within the county. | | | Energy storage is an increasingly important component of renewable energy systems, allowing the storage of excess electricity for use when the renewable energy system is not generating electricity (e.g., at nighttime when a solar energy system is not producing power). Energy storage goals are mandated by the State. Including energy storage policies along with renewable energy policies ensures consistency with State goals and creates a framework for Mono County community members to install storage facilities. |
| | | <p>Action 11.A.1.d. Support installation of community shared renewable energy systems for new and existing buildings to generate an increased supply of renewable energy for local use.</p> <p>Action 11.A.1.e. Require new residential developments of at least five units, or nonresidential developments of at least 5,000 sq. ft., to evaluate the feasibility of on-site renewable energy facilities and to install on-site renewable energy systems if feasible.</p> | These two new actions create additional opportunities for renewable energy development. The first action supports the creation of community-shared renewable energy systems, wherein a single renewable energy system helps to power multiple buildings. This allows residents and businesses that are unable to install renewable energy on their own buildings (due to financial or environmental constraints, rental or lease agreements, etc.) to benefit from renewable energy systems. The second action |

| TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3 | | | |
|---|--------|---|--|
| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
| | | | would require new larger developments to consider the feasibility of installing on-site renewable energy systems and would require inclusion of these systems if feasible. |
| Objective 12.B. Seek opportunities to restore the local environment at renewable energy facility sites | | <p>Policy 12.B.1. Require renewable energy facilities to conduct restoration activities at the end of the facility's operational life and at the end of construction activities.</p> <p>Action 12.B.1.a. Require large-scale renewable energy facilities to estimate costs for facility decommissioning and site restoration and to bond for the amount identified in the cost estimate.</p> <p>Action 12.B.1.b. Require all structures and materials, including the renewable energy system itself, to be reused or recycled at the end of its operational life or once it is no longer needed.</p> <p>Action 12.B.1.c. Require restoration of all areas disturbed by construction or operation of renewable energy facilities to County standards.</p> <p>Action 12.B.1.d. Require inspection of the project site following decommissioning and restoration activities associated with renewable energy facilities to ensure that the work has been completed to County standards.</p> | <p>This set of new objectives, policies, and actions enables larger-scale renewable energy facilities while minimizing long-term environmental impacts by establishing a decommissioning and restoration process. Owners of renewable energy facilities would be required to remove all structures when the facility ceases to operate and to recycle all possible materials. Owners would also be required to restore the site to natural conditions and to purchase a bond to cover the cost of this activity prior to obtaining a permit. These policies protect the natural environment while continuing to allow large-scale renewable energy facilities that reduce local and statewide GHG emissions.</p> |
| | | Action 16.B.1.c. Encourage existing buildings to install electrically powered appliances instead of wood pellet or propane units. | Current draft General Plan measures support the use of wood pellet or propane appliances in place of noncertified wood-burning stoves. This new action would go further by |

| TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3 | | | |
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| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
| | | | supporting electrification rather than alternative heating fuels, further reducing GHG emissions and improving air quality. |
| | | Action 17.A.1.a. Offer incentives (e.g., streamlined permitting, prescriptive designs, fee waivers/reductions) for verifiable green building practices that exceed state or local minimum standards, e.g., ground-source heat pumps or buildings that meet zero net-energy standards. | Including zero net-energy concepts in the draft General Plan would help implement progress toward the statewide goal that new buildings be zero net energy by 2020 (for residential buildings) or 2030 (for nonresidential buildings). Offering incentives for zero net energy helps to raise the profile of this item and puts Mono County on a path to meet statewide goals. |
| | | Action 17.A.1.e. Require all new construction to include passive solar design features, including east–west orientation, materials with a high thermal mass, and properly positioned windows and shading. | Using passive solar design features in new construction reduces energy needs for heating and cooling without substantially affecting the appearance of new buildings. This is of particular importance in Mono County where many buildings rely on propane or wood for heating, which create more GHG emissions than electricity. |
| LAND USE ELEMENT | | | |
| | | Action 1.A.1.a. Require infill development in existing communities and subdivisions. New residential subdivisions shall occur within or immediately adjacent to existing community areas. New residential development outside existing community areas and subdivisions shall be limited to an overall density of one unit per 40 acres, plus an accessory dwelling unit, and shall be limited to permanent year-round residency. | These revisions would strengthen efforts to focus new development in or adjacent to existing communities. This revised action would prohibit new development outside existing communities and subdivisions, unless it had a max density of one unit per 40 acres and was used for permanent residents rather than as a rental/ vacation unit. This action would preserve existing resources & reduce vehicle trips by placing new development |

| TABLE 6-2: PROACTIVE POLICIES ASSOCIATED WITH ALTERNATIVE 3 | | | |
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| GOAL | POLICY | ACTION | RATIONALE/ PROPOSED POLICY |
| | | | closer to homes, jobs, schools, retail stores, and other basic needs. |
| REGIONAL TRANSPORTATION PLAN | | | |
| | Objective 4.D.4. Work with electrical providers (Southern California Edison and Liberty Utilities) to develop and implement an electric vehicle DC fast-charging infrastructure plan. Coordinate efforts for major routes, such as US 395, to provide alternative fueling infrastructure for the entire corridor, in compliance with State initiatives. | | DC fast-chargers allow full charging of electric vehicles in a much shorter amount of time (15–30 minutes) than conventional electric-vehicle chargers. By creating a plan for DC fast-charging, Mono County can make it easier for residents and visitors to use electric vehicles thereby helping to remove a barrier to increased adoption. This effort can also be implemented alongside the Digital 395 project. |
| | Objective 4.D.6. Work with transportation providers to purchase hybrid or alternative-fuel buses whenever feasible. | | Mono County cannot require transit providers to purchase hybrid or alternative-fuel buses, but can encourage providers and support efforts. This objective supports objectives to increase public transit operations while reducing GHG emissions. |
| | Objective 4.E.2. Establish a shuttle service connecting hotels, resorts, and campgrounds to locations such as Bodie, Mono Lake, and the June Mountain Ski Area through the Unmet Transit Needs process. | | These revisions would commit the County to establishing a visitor-serving shuttle rather than continuing to evaluate feasibility. Creating this shuttle would reduce GHG emissions & traffic congestion, particularly during peak visitor seasons. |
| | | Policy 7.B. Require large employers (50+ employees) to reduce commute-related trips by providing transit for employees, and to promote carpooling among their employees, and other effective strategies. | This revised policy would require large employers to reduce commute-related trips through a variety of approaches. Without mandating specific actions, this item would achieve trip reductions for such employers, thereby reducing emissions and congestion. |